

IN THE FRANKLIN COUNTY COMMON PLEAS, FRANKLIN COUNTY OHIO
CIVIL DIVISION

JALEN BRADLEY
AND
JA-DAWN BRADLEY
C/O W. JEFFREY MOORE, ESQ.
33 SOUTH GRANT AVENUE
COLUMBUS, OHIO 43215

PLAINTIFFS,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OHIO 43215

THE CITY OF COLUMBUS
DIVISION OF POLICE
120 MARCONI BOULEVARD
COLUMBUS, OHIO 43215

COLUMBUS POLICE OFFICER
CARL HARMON
120 MARCONI BOULEVARD
COLUMBUS, OHIO 43215

COLUMBUS POLICE OFFICER
JACOB VELAS
120 MARCONI BOULEVARD
COLUMBUS, OHIO 43215

COLUMBUS POLICE OFFICER
IAN MANSBERGER
120 MARCONI BOULEVARD
COLUMBUS, OHIO 43215

COLUMBUS POLICE OFFICER
WILLIAM PHILLIPS
120 MARCONI BOULEVARD
COLUMBUS, OHIO 43215

CASE NO.

JUDGE:

JURY DEMAND ENDORSED
HEREIN

COLUMBUS POLICE OFFICER :
AUSTIN EARLE :
120 MARCONI BOULEVARD :
COLUMBUS, OHIO 43215 :

COLUMBUS POLICE OFFICERS :
JOHN DOE'S 1, 2, 3, AND 4 :
120 MARCONI BOULEVARD :
COLUMBUS, OHIO 43215 :

COLUMBUS POLICE OFFICERS :
JANE DOE'S 1 AND 2 :
120 MARCONI BOULEVARD :
COLUMBUS, OHIO 43215 :

DEFENDANTS. :

COMPLAINT

- 1) The Plaintiffs are Jalen Bradley and Ja-Dawn Bradley herein after referred to as Plaintiffs.
- 2) The Defendants are City of Columbus, The City of Columbus Division of Police, Columbus Police Officers Carl Harmon, Jacob Velas, Ian Mansberger, William Phillips, Austin Earle, and John Doe's 1, 2, and 3, Jane Does 1, 2, and 3.
- 3) The Defendants are all, hereinafter referred to jointly, severely, and individually as Defendants. Also at times referred to as Defendant Police Officers including all the John and Jane Does.
- 4) The John and Jane Does are necessary herein because the City of Columbus Division of Police and the Ohio Bureau of Criminal Investigation have been slow and evasive in releasing the Police Officers names who were involved herein.
- 5) At all times relevant the actions of the Defendants took place in the City of Columbus, in Franklin County Ohio.
- 6) At all times relevant the Defendants were Police Officers under the supervision, control,

direction, and employment of the Defendant, City of Columbus, and/or City of Columbus Division Police and/or working in accordance with the City of Columbus or City of Columbus Division of Police policies and procedures on its Officer's working special duty.

- 7) Defendant Police Officers and John and Jane Doe Police Officers, are being sued in their personal and professional capacities.
- 8) On or about the 6th of May 2023, the Plaintiffs who are brother and sister were out in public in the Short North area of Columbus.
- 9) While walking down the street, the Plaintiffs were attacked by a group of males who were armed with weapons and began shooting at the Plaintiffs injuring both. Plaintiff Jalen Bradley, who was legally armed with a gun, returned fire and with unarmed Plaintiff Ja-Dawn Bradley were attempting to run for cover away from the shots. When the shooting stopped the Defendant Police Officers, who didn't know what was going on, opened fire on the Plaintiffs, who were still looking for cover in case the shooters came back.
- 10) The Defendant, Police Officers, fired no fewer than 20 shots at the Plaintiffs who were just trying to avoid being shot by the criminals who were shooting at them.
- 11) The Defendant, Police Officers, recklessly shot at the Plaintiffs, without cause and ignoring the safety of all pedestrians, vehicles and patrons of businesses in the area as well as ignoring back drops and other safety precautions putting other civilians in harms way.
- 12) The Defendant, Police Officers, were never shot at and yet shot with zeal at the Plaintiffs who were doing nothing more than fleeing for their lives.
- 13) Even when the injured Plaintiff Jalen Bradley was hobbling away, the Defendants reloaded and fired 11 rounds into Mr. Bradley's back and neck causing him to be paralyzed and into the innocent bystander Plaintiff Ja-Dawn's body while she was on the ground, shooting her

3 or 4 times in the leg, breast, and buttocks causing her to be injured.

14) Once he on the ground, the Defendants handcuffed the totally incapacitated Plaintiff Jalen

Bradley and rolled him over numerous times adding to his injuries and pain and suffering.

15) The Defendants used excessive force and deadly force to injure the Plaintiffs without provocation or cause.

16) The Defendants fired shots so recklessly that upon information and belief they shot several moving vehicles and at least 2 to 3 people inside those vehicles and/or civilians who were passing by the area.

17) The Defendants recklessly shot the Plaintiffs long after the initial shots were fired and when the Plaintiffs were subdued or when they were not a threat.

18) The Plaintiffs, who were trying to defend and protect themselves from criminals became the victims of the reckless actions and faulty judgement of the Defendant Police Officers herein and/or Defendants City of Columbus and City of Columbus Division of Police.

19) The Defendants, City of Columbus and/or City of Columbus Division of Police as usual ignored the Officer's illegal and reckless actions and ratified their behavior.

20) The Defendants, City of Columbus and/or City of Columbus Division of Police upon information and belief have a policy, procedure, habit, and routine practice of ignoring and allowing, Officers use of deadly force, excessive force, and condoning an act first think later attitude, which has caused and continues to cause injury and death to innocent citizens of Columbus and/or Franklin County.

21) The Defendants City of Columbus and/or City of Columbus Division of Police upon information and belief through it's collective bargaining negotiations and acquiescence to Police Union demands, have created a situation where it's Officers good and bad have

protections against discipline, firing, demoting and retraining which leads to the inability to discipline and terminate the employment of Police Officers on the force for bad behavior and illegal actions.

22) The Defendants, The City of Columbus and/or City of Columbus Division of Police, upon information and belief, have allowed it's Officers to ignore and/or side step the law and the Constitutions of the State of Ohio and United States, through a policy, procedure, habit and practice of allowing the harassment of minorities, poor people and people of color.

23) The Defendants, City of Columbus and/or Defendant City of Columbus Division of Police upon information and belief have/has a policy, procedure, and/or practice of proactive policing which encourages Officers to aggressively pursue, confront, seize and arrest citizens without cause or probable cause in violation of the rights of the citizens guaranteed by the Constitutions of the United States and State of Ohio to see if the citizens might be violating the law.

24) Upon information and belief the Defendants City of Columbus and/or City of Columbus Division of Police has/have a policy of requiring its Officers to be armed 24 hours per day, 7 days per week including while working special duty.

25) Upon information and belief, the Police Officer Defendants herein have, during their employment as City of Columbus Police Officers, been the subject of civilian complaints involving the use of excessive force and/or uncontrollable fits of anger and outrage and/or physical and emotional abuse.

26) Defendants City of Columbus Division of Police and/or City of Columbus, and/or Defendant Police Officers knew or should have known that the Defendant's propensity for violence and/or improper conduct involving the public could result in injury to citizens and

did recklessly and negligently supervise and/or train Defendant and/or discipline the Defendants as City of Columbus Police Officer.

27) Defendant's said acts were committed pursuant to procedures, policies and customs of Defendants City of Columbus Division of Police and/or City of Columbus which included failure to adequately and reasonably train, supervise and discipline police officers and the failure to adequately and reasonably investigate civilian complaints of police misconduct.

28) Upon information and belief these policies and practices of the Defendant, City of Columbus, Defendant City of Columbus Division of Police create an aura, opinion, belief, atmosphere and environment for their Officers of immunity from fault, blame and responsibility for their illegal behavior.

29) The actions of the Defendants were done under color of State law.

30) The acts of the Defendants were willful, wanton, malicious, purposeful, knowing, reckless and negligent.

31) The Defendants committed attempted murder, felonious assault, and assault and battery upon the Plaintiffs.

32) The Defendants knew or should have known that their acts would cause the Plaintiffs' injury, fear, terror, distress, anguish and other mental and psychological injury.

29) The actions of the Defendants were extreme and outrageous.

33) The Defendant's actions were unacceptable in a civilized society.

34) The Defendant's actions caused the Plaintiffs emotional distress and mental anguish.

35) The actions of the Defendants were in violation of the Civil Rights of the Plaintiffs under the United States Constitution's 4th, 5th, 8th, and 14th Amendments and Article 1 Sections 1 and 16 of the Constitution of the State of Ohio.

36) The Defendant's actions violated the Plaintiffs rights under 42 U.S.C. 1983, 1985, and 1988.

37) As a direct and proximate cause of all the Defendant's actions the Plaintiffs have suffered permanent injury, serious injury, and other injuries both mental and physical.

WHEREFORE each Plaintiff demands judgment against the Defendants for compensatory injuries in excess of ten million dollars, exemplary damages in excess of two million dollars, punitive damages in excess of two million dollars, Attorney's fees, costs of prosecuting this matter, and any other relief to which they are entitled in Law or Equity.

Respectfully Submitted,

/s/ W. Jeffrey Moore

W. Jeffrey Moore, Esq. (0023429)
Moore & Yaklevich
33 South Grant Avenue
Columbus, Ohio 43215
Phone: (614) 222-0509
Facsimile: (614) 241-5909
Email: jeffmooreatty@gmail.com
Counsel For Plaintiff

DEMAND FOR JURY TRIAL

Now comes the Plaintiff, by and through undersigned counsel, and hereby demands a Jury Trial in this matter.

/s/ W. Jeffrey Moore

W. Jeffrey Moore, Esq. (0023429)
Moore & Yaklevich
33 South Grant Avenue
Columbus, Ohio 43215
Phone: (614) 222-0509
Facsimile: (614) 241-5909
Email: jeffmooreatty@gmail.com
Counsel For Plaintiff

MARYELLEN O'SHAUGHNESSY

FRANKLIN COUNTY CLERK OF COURTS
GENERAL DIVISION, COURT OF COMMON PLEAS

CASE TITLE: JALEN BRADLEY ET AL -VS- THE CITY OF COLUMBUS ET AL CASE NUMBER: 24CV003632
AL

TO THE CLERK OF COURTS, YOU ARE INSTRUCTED TO MAKE:
CERTIFIED MAIL

DOCUMENTS TO BE SERVED:
COMPLAINT

PROPOSED DOCUMENTS TO BE SERVED:

UPON:
AUSTIN EARLE
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

WILLIAM PHILLIPS
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

IAN MANSBERGER
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

JACOB VELAS
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

CARL HARMON
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

THE CITY OF COLUMBUS DIVISION OF POLICE
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

THE CITY OF COLUMBUS

90 WEST BROAD STREET
COLUMBUS, OH 43215

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215

JA DAWN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215

JUVENILE CITATIONS ONLY:

HEARING TYPE:

__ Date already scheduled at : Courtroom:

Electronically Requested by: WILLIAM J MOORE
Attorney for:

E3957 - C44

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:16
CLERK OF COURTS

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

JALEN BRADLEY
C/O W JEFFREY MOORE E
33 SOUTH GRANT AVENUE
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097411

CIV354

E3957 - C45

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:19
CLERK OF COURTS

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

JA DAWN BRADLEY
C/O W JEFFREY MOORE E
33 SOUTH GRANT AVENUE
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097428

CIV354

E3957 - C46

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

AUSTIN EARLE
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097435

CIV354

E3957 - C47

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS
FRANKLIN COUNTY
2024 MAY -8 PM
CLERK OF COURTS

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

WILLIAM PHILLIPS
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097442

CIV354

E3957 - C48

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS
FRANKLIN COUNTY
2024 MAY -8 PM
CLERK OF COURTS

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

IAN MANSBERGER
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097459

CIV354

E3957 - C49

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

COMMON PLEAS COURT
FRANKLIN COUNTY
2024 MAY -8 PM
CLERK OF COURT

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

JACOB VELAS
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097466

CIV354

E3957 - C50

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:27
CLERK OF COURTS

**C E R T I F I E D
M A I L
R E C E I P T**

05/07/24

CARL HARMON
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

**CERTIFIED
NUMBER**

9214890119 522809097473

CIV354

E3957 - C51

FROM...

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS
FRANKLIN COUNTY
2024 MAY -8 PM 4:00
CLERK OF COURTS

C E R T I F I E D
M A I L
R E C E I P T

05/07/24

THE CITY OF COLUMBUS
120 MARCONI BOULEVARD
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

CERTIFIED
NUMBER

9214890119 522809097480

CIV354

E3957 - C52

FROM

MARYELLEN O'SHAUGHNESSY
FRANKLIN COUNTY CLERK OF COURTS
373 SOUTH HIGH STREET
COLUMBUS, OHIO 43215-4579

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:17
CLERK OF COURTS
C E R T I F I E D
M A I L
R E C E I P T

05/07/24

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH
43215

24CV-05-3632 H

JALEN BRADLEY
VS
THE CITY OF COLUMBUS

SERVICE ITEM: 01
ORIGINAL SUMMONS

CERTIFIED
NUMBER

9214890119 522809097497

CIV354

E3957 - E53

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:07
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E54

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:07
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

JA DAWN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E55

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4: 07
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

AUSTIN EARLE
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E56

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:07
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

WILLIAM PHILLIPS
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S).

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E58

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632
CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:01
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

JACOB VELAS
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,
BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E58

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632
CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:01
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

JACOB VELAS
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,
BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E59

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:01
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

CARL HARMON
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,
BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E60

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO
2024 MAY -8 PM 4:07
CLERK OF COURTS

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

THE CITY OF COLUMBUS DIVISION OF POLICE
120 MARCONI BOULEVARD
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)

E3957 - E61

MARYELLEN O'SHAUGHNESSY

CLERK OF THE FRANKLIN COUNTY COMMON PLEAS COURT, COLUMBUS, OHIO 43215
CIVIL DIVISION

JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF,

VS.

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215,

DEFENDANT.

24CV-05-3632

CASE NUMBER

CLERK OF COURTS

2024 MAY -8 PM 4:07

FILED
COMMON PLEAS COURT
FRANKLIN CO., OHIO

**** SUMMONS ****

05/06/24

TO THE FOLLOWING NAMED DEFENDANT:

THE CITY OF COLUMBUS
90 WEST BROAD STREET
COLUMBUS, OH 43215

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY
COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY: JALEN BRADLEY
C/O W JEFFREY MOORE ESQ
33 SOUTH GRANT AVENUE
COLUMBUS, OH 43215,

PLAINTIFF(S) .

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF
THE PLAINTIFF'S ATTORNEY IS:

W J. MOORE
MOORE & YAKLEVICH
33 S GRANT AVE
COLUMBUS, OH 43215

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S
ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY
OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE
OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER
MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A
COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED
AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY
CLERK OF THE COMMON PLEAS
FRANKLIN COUNTY, OHIO

BY: TAMMY SEELIG, DEPUTY CLERK

(CIV370-S03)



FILED
COMMON PLEAS COURT
FRANKLIN CO. OHIO

2024 MAY 14 AM 11:03

CLERK OF COURTS

Date Produced: 05/13/2024

COC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 1952 2809 0974 28. Our records indicate that this item was delivered on 05/10/2024 at 12:13 p.m. in COLUMBUS, OH 43215. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in dark ink, consisting of several fluid, overlapping strokes.

Address of Recipient :

A handwritten address in dark ink, appearing as a single line of text.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 4321524CV03632BRADL



FILED
COMMON PLEAS COURT
FRANKLIN CO. OHIO

2024 MAY 14 AM 11:03

CLERK OF COURTS

Date Produced: 05/13/2024

COC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 1952 2809 0974 11. Our records indicate that this item was delivered on 05/10/2024 at 12:13 p.m. in COLUMBUS, OH 43215. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in dark ink, consisting of several fluid, overlapping strokes.

Address of Recipient :

A handwritten address in dark ink, appearing as a single line of text.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 4321524CV03632BRADL